

EXHIBIT 12

(Supplement)

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 - - - - -x

5 SERGEY LEONTIEV,

6 Plaintiff,

Case No. 16-cv-3595

7 -against-

8 ALEXANDER VARSHAVSKY,

9 Defendant.

10 - - - - -x

11 December 16, 2016

12 10:12 a.m.

13
14 Videotaped deposition of
15 ANDREI PAVLOVICH, taken by Plaintiff,
16 pursuant to Notice, held at the offices of
17 Roschier Asianajotoimisto Oy, Keskuskatu
18 7A, Helsinki, Finland, before
19 Sharon Lengel, a Registered Professional
20 Reporter, Certified Realtime Reporter, and
21 Notary Public of the State of New York.

22
23 * * *
24
25

A P P E A R A N C E S:

GIBSON, DUNN & CRUTCHER LLP

Attorneys for Plaintiff

200 Park Avenue

New York, New York 10166

BY: MARSHALL KING, ESQ.

ALISON A. WOLLIN, ESQ.

DEBEVOISE & PLIMPTON LLP

Attorneys for Defendant

801 Pennsylvania Avenue, N.W.

Washington, D.C. 20004

BY: NICHOLAS C. TOMPKINS, ESQ.

COLBY A. SMITH, ESQ.

ALSO PRESENT:

DAVID ROSS ELLIOTT, Videographer

NATALIA MURINA, Interpreter

VICTOR POTAPOV, Check Interpreter

VITALIY POPOV, ESQ.

* * *

1 PAVLOVICH

2 Motors Moscow.

3 Q. Did you know Mr. Varshavsky
4 before you started working at what was
5 then New York Motors?

6 A. Himself and myself were
7 competitors, because I used to work for a
8 different automobile company.

9 Q. What was the name of the company
10 that you used to work at before Avilon?

11 A. JSC Panavto.

12 Q. Is Panavto affiliated with
13 Avilon today?

14 A. No.

15 Q. Has Panavto been affiliated with
16 Avilon at any point in time?

17 A. No.

18 Q. Do you have an ownership
19 interest in Avilon?

20 A. Yes, I do.

21 Q. What type of ownership interest?

22 A. Five percent.

23 Q. Do you own five percent directly
24 or through an intermediary company?

25 A. Directly.